

# Exhibit Q

*Certified Copy*

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF LOS ANGELES

LAOSD ASBESTOS CASES	)	
-----	)	
PUI FONG and THAI WONG,	)	
	)	
Plaintiffs,	)	JCCP Case No. 4674
	)	
vs.	)	LASC CASE NO.
	)	BC 675449
IMERYS TALC AMERICA, INC.;	)	
et al.,	)	
	)	
Defendants.	)	VOLUME II
-----	)	Pages 170-300

CONTINUATION OF THE TELEPHONIC DEPOSITION OF  
WILLIAM E. LONGO, PH.D.

February 12, 2019

11:40 a.m.

Suwanee, Georgia

Frances Buono, RPR, CCR-B-791



APPEARANCES OF COUNSEL

On behalf of the Plaintiffs:

HENRY STEINBERG, Esq.  
Kazan, McClain, Satterley & Greenwood  
55 Harrison Street  
Suite 400  
Oakland, California 94607  
Hsteinberg@kazanlaw.com

On behalf of the Defendant,  
Cyprus Mines Corporation; Imerys Talc America,  
Inc.; and Imerys Talc Vermont, Inc.:

KAREN LUONG, Esq.  
Dentons US LLP  
601 South Figueroa Street  
Suite 2500  
Los Angeles, California 90017-5704  
Karen.luong@dentons.com

On behalf of the Defendants,  
Johnson & Johnson and Johnson & Johnson Consumer,  
Inc.:

KIMBERLY BRANSCOME, Esq.  
Kirkland & Ellis, LLP  
333 South Hope Street  
29th Floor  
Los Angeles, California 90071  
Kimberly.branscome@kirkland.com

- - -

1           A.       He has a degree in geology. He has been  
2       doing this type of analysis for 30 years. He was  
3       trained, I think at McCrone, way back when. And he  
4       has the patience to analyze at the PLM level that  
5       takes long periods of time. This is not your  
6       standard PLM analysis that somebody may do for an  
7       asbestos-containing bulk sample. It --

8           Q.       Why does it take so much longer to analyze  
9       talc for asbestos using PLM than a typical  
10      asbestos-containing material?

11          A.       Well, it doesn't have to take that long,  
12      and I think the results show it. You don't find  
13      anything. Because you're at these trace levels, you  
14      have to make sure you cover the entire area.

15                  Paul looks at approximately  
16      950 millimeters squared area. And you have to be  
17      able to spend the time.

18                  And in addition to him doing that,  
19      spending the time, we have a high definition camera  
20      set up on the polarized light microscope connected to  
21      a high definition monitor so that when Mr. Hess finds  
22      a potential amphibole structure, he can then look at  
23      it on the monitor so that he can do fine focus. And  
24      also we have a special objective lens that's a plane  
25      objective lens that flattens the -- gives you a


C E R T I F I C A T E

STATE OF GEORGIA:

COUNTY OF HALL:

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing pages 170 through 296 represent a true, complete, and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

This, the 14th day of February, 2019.

  
FRANCES BUONO, B-791  
Georgia Certified Court Reporter

